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Dated: July 28, 2025

*As the motions to dismiss have been taken under submission, the instant motion is denied as moot.

Attorneys for Defendant-Intervenors
The Center for Biological Diversity, Resource
Renewal Institute, and Western Watersheds Project

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DOES 1-150, Individual Persons

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
INTERIOR, a federal agency; DOUG
BURGUM, Secretary of the Interior;
NATIONAL PARK SERVICE, a federal agency;
JESSICA BOWRON, Acting Director of the
National Park Service; DAVID SZYMANSKI,
Regional Director, Pacific West Region; THE
NATURE CONSERVANCY, a District of
Columbia nonprofit corporation;

Defendants;

RESOURCE RENEWAL INSTITUTE,
CENTER FOR BIOLOGICAL DIVERSITY,
and WESTERN WATERSHEDS PROJECT;

Defendant-Intervenors.

Case No. 3:25-cv-01115-MMC

**ADMINISTRATIVE MOTION FOR
REMOTE APPEARANCE RE:
HEARING ON MOTIONS TO DISMISS**

Hearing: August 1, 2025

Time: 9:00 am

Court: Courtroom 7, 19th Floor

Judge: Hon. Maxine M. Chesney

1 I, Elizabeth Potter, lead counsel for Defendant-Intervenors Resource Renewal Institute,
 2 Center for Biological Diversity, and Western Watersheds Project (“Conservation Groups”),
 3 respectfully request to appear at the above-referenced hearing through the Court’s public Zoom
 4 link. Due to personal issues, including the recent hospitalization and death of my mother, I have
 5 been out of the office for much of July and am now unavailable to plan travel from Oregon,
 6 where my home and office are located, to California for the hearing on August 1, 2025. My co-
 7 counsel are unavailable to travel and attend in my place.

8 Counsel deeply regrets this development and understands that the Court requires in-
 9 person appearances for hearings on contested motions. However, this request should not unduly
 10 burden the Court and the parties. The hearing on the Motions to Dismiss will involve numerous
 11 complex issues that are being litigated by the other parties—Plaintiffs, Federal Defendants, and
 12 Defendant The Nature Conservancy. Defendant-Intervenors did not take a position on those
 13 numerous issues and instead filed a very short Partial Motion to Dismiss only one of Plaintiffs’
 14 six claims, to which Plaintiffs responded in a mere four sentences. *See* ECF No. 75. As a result,
 15 further argument on their Motion should not be needed, particularly in light of the substantial
 16 time that will be needed to address the parties’ numerous other contentious issues, unless, of
 17 course, the Court has specific questions for counsel.

18
 19 DATED: July 25, 2025

Respectfully submitted,

20 s/Elizabeth H. Potter

21 Elizabeth Potter *pro hac vice*

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25 *Attorney for Defendant-Intervenors*

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